

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

YOUNG CONSERVATIVES OF TEXAS §
FOUNDATION §
§
Plaintiff, § CIVIL ACTION NO. 4:20-cv-00973
v. §
§
THE UNIVERSITY OF NORTH TEXAS, §
THE UNIVESITY OF NORTH TEXAS §
SYSTEM, NEAL SMATRESK, §
PRESIDENT OF THE UNIVERSITY OF §
NORTH TEXAS and SHANNON §
GOODMAN, VICE PRESIDENT FOR §
ENROLLMENT OF THE UNIVERSITY OF §
NORTH TEXAS,
§
Defendants. §

DEFENDANTS' REQUEST FOR EXTENSION OF TIME

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

NOW COMES, The University of North Texas, The University of North Texas System, Neal Smatresk, President of the University of North Texas, and Shannon Goodman, Vice President for Enrollment of the University of North Texas (collectively “Defendants”), the Defendants herein, by its attorneys, submits this Request for Extension of Time, to extend the time to file its motion under Federal Rule of Civil Procedure 12, and states as follows:

1. Plaintiff filed this suit on November 16, 2020.
2. Defendants were served on December 2, 2020
3. Defendants filed their Notice of Removal on December 23, 2020.
4. Plaintiffs have until January 23, 2021 to file a Motion to Remand.

5. Defendants' deadline to answer the complaint or file a motion under Federal Rule of Civil Procedure 12(b) is due Wednesday, December 30, 2020. Fed. R. Civ. P. 81(c)(2).

6. Defendants are employees of a public university which is closed for winter break from December 24, 2020 until January 1, 2021.

7. Defendants have conferred with counsel for the Plaintiff and confirmed that an extension of 13 days to file a motion under Fed. R. Civ. P. 12(b) is not opposed.

8. This request for an extension is not sought for purposes of delay and will not prejudice any party to this action.

WHEREFORE pursuant to Local Rule CV-12, Defendants respectfully request the clerk of this Honorable Court enter an Order granting an extension of the Defendants' deadline to file a motion under Fed. R. Civ. P. 12(b) to **January 12, 2021** and such other relief as the Court deems proper.

Respectfully submitted,

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UNIVERSITY OF NORTH TEXAS SYSTEM,
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UNIVERSITY OF NORTH TEXAS, AND
SHANNON GOODMAN, VICE PRESIDENT FOR
ENROLLMENT OF THE UNIVERSITY OF
NORTH TEXAS**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Request for Extension of Time has been served upon the following on this the 30th day of December, 2020:

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By: /s/ Sandy Hellums-Gomez

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CERTIFICATE OF CONFERENCE

I certify that I conferred with Robert Henneke, counsel for the Plaintiff, regarding the foregoing Request for Extension of Time and Plaintiff was not opposed.

By: *s/ Sandy Hellums-Gomez*
Sandy Hellums-Gomez